Klimcsak.Raymond@epamail.epa.gov
06/15/2005 02:34 PM

To mlcapichioni@sherwin.com
cc hmartin@elminc.com, steve.clough@westonsolutions.com, s.jones@westonsolutions.com, LArabia@TtFWI.com
bcc
Subject Re: response to epa comments/request regarding groundwater wells

thank you for the (quick) response Mary Lou.

I am presently on a conf. call for another site and will have to take a closer look once I am finished. However, based upon your comments, I (will most likely) modify EPA's response to SWC's Tech Memos. I would suggest that we could do this by e-mail, but since most changes are ultimately a change or addition to the 2003 Work Plan, I would rather that the letter come from Carole Petersen.
but again, based upon this e-mail, I will include the most current information.

thanks
Ray

Ray Klimcsak
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06/15/2005 01:43 PM

To Raymond Klimcsak/R2/USEPA/US@EPA
cc s.jones@westonsolutions.com, hmartin@elminc.com, steve.clough@westonsolutions.com
Subject response to epa comments/request regarding groundwater wells

Ray -

sorry i didn't get back to you sooner. we have been reviewing your comments regarding the groundwater wells and wanted to get this to you

before your site visit tomorrow. i am in the office the rest of today and tomorrow as well, if you would like to discuss further.

after reviewing EPA's preliminary comments on the Shallow Groundwater Technical Memo dated 5/23/05, we offer the following responses -

1. EPA has requested that one additional monitoring well be installed at the Dump Site in the source area (green circle on attached figure). we agree that this one additional well could provide some needed information, however, as we discussed on the phone call yesterday, the only issue may be access for the drill rig since the proposed location is down a steep, wooded embankment.

it is my understanding that you will walk the site with Sally and Art on Thursday to agree upon a location.

2. EPA has requested that our down gradient monitoring well be located approximately 100 feet to the north within the fence area. while we have no objection to modifying the location as requested, again we have concerns that access for the drill rig may be an issue. there is no access through the fence in that area of the site and therefore the drill rig would need to travel down a steep slope and through a wooded area.

as with #1 above, it is my understanding that you will walk the site on Thursday to agree upon a location.

3. EPA has requested that soil samples be collected from the monitoring well boreholes to ensure that the monitoring wells have been placed in the correct locations and assist with proposed locations of deep wells. in response to this request, we have looked at each of the areas where wells are to be installed and offer the following -

Dump Site
as per the attached Strategic Sampling Map, 3 of the 4 proposed wells are located in close proximity to proposed soil borings. we propose that the soil sample data collected from these soil borings would be representative of the contaminant characteristics in the proposed wells. one option would be to shift the locations of the proposed wells slightly to be immediately adjacent or co-located with these borings without compromising the intent of the well network. the 4th well (green circle) does not have any proposed soil borings in its vicinity, therefore, we concur that it could be beneficial to collect samples from this monitoring well borehole at depths consistent with Addendum #1 of the Work Plan (unless the well is relocated near a proposed boring location as a result of the field visit on thursday).

Burn Site
as per the attached Strategic Sampling Map, 6 of the 7 proposed wells are located in close proximity to proposed soil borings. as discussed above, one option would be to shift the locations of the proposed wells slightly to be adjacent or co-located with these borings without compromising the intent of the well network. in addition, historic data

from the Burn Site can also be utilized to supplement the data from the proposed borings. Figure 5-1 from the 2003 Work Plan depicts historic sample locations. previously, approximately 131 locations were sampled, 595 samples were submitted for lead analysis with 10% of those 595 samples analyzed for TAL metals (60 samples), and 5% of the 595 samples analyzed for full TAL/TCL (33 samples).

the well located southwest of the Burn Area is not located in close proximity to a soil boring, therefore, we concur that it could be beneficial to collecting soil samples from this monitoring well borehole at depths consistent with Addendum #1 of the Work Plan.

Bridgewood Lake

we do not agree that additional soil profiles are necessary for the 2 proposed monitoring wells at Bridgewood Lake for the following reasons:

A. the purpose of these wells was to evaluate shallow groundwater quality potentially impacted by contaminated soils previously present at the area referred to as the Railroad Track Area. since the contaminated soils were in close proximity to Bridgewood Lake, these wells were positioned to determine if the shallow groundwater flowing into the lake has been impacted.

contaminated soils were identified in this area in 1996. Sherwin-Williams removed 1,960 tons of contaminated soils at the Railroad Track Area as part of a Removal Action in 1996. the excavation area was approximately 400 feet long and 80 feet wide, centered around the railroad track. a figure from the Appendix F of the 2003 RI Work Plan that depicts the excavation limits and post-excavation sample locations is attached for your review. a total of 197 post-excavation samples were collected at the base of the excavation, along the sidewalls and outside of the perimeter of the excavation. as shown in the attached figure, several samples were located in the vicinity of the proposed wells. all samples were analyzed for lead and arsenic.

B. the purpose of resampling this area as part of the RI is to collect TAL/TCL analysis to confirm that other contaminants are not present. as you will note from the attached Railroad Site Strategic Sampling Locations figure, there are 4 borings being installed between the former excavation and Bridgewood Lake which are in the same vicinity of the wells (the wells are shown on the map for Bridgewood Lake but are hand drawn on the attached Railroad figure). three samples for full TAL/TCL analysis will be collected from each boring; one surface soil sample, one above the water table and one in-between the surface and water table.

therefore, our conclusion is that the data collected in 1996 as part of the Removal Action, and the data to be collected during the Strategic Sampling event, should provide adequate soil data in the vicinity of each well.

again, feel free to give me a call if you would like to discuss any of the above further.

hope you have good weather in gibbsboro tomorrow - sorry i cannot join you -

mlou

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